



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert K. Wilson, Treasurer
Ohio Republican State Central
and Executive Committee
AKA: The Ohio Republican Party
172 East State Street, Ste. 400
Columbus, OH 43215

APR 19 1995

Identification Number: C00162339

Reference: Year End Report (11/29/94-12/31/94)

Dear Mr. Wilson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule H4 of your report discloses disbursements for activity reported as 100% non-federal. Schedule H1 indicates that the federal allocation for administrative and generic voter drive costs is 22%. In addition, Schedule H3 discloses receipts of \$226,141.72 for administrative/ voter drive. A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer from its non-federal account solely to cover the non-federal share of the allocable expenses. 100% non-federal administrative costs do not fall within the definitions of an allocable expense, and constitute an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Please be advised that a committee may establish a separate allocation account into which funds from its federal and non-federal accounts may be deposited solely for the purpose of paying the allocable expenses of joint federal and non-federal activities. This

allocation account is considered a federal account, subject to federal reporting requirements.

Further, the committee may transfer funds from its federal and non-federal accounts to its allocation account in amounts proportionate to the federal or non-federal share of each allocable expense. A committee that makes transfers from its non-federal account to its allocation account must itemize in its reports the allocable activities for which the transfers were intended to pay, and the money must not be transferred more than 10 days before or more than 60 days after the payments for which they were designated.

Any portion of a transfer from a committee's non-federal account to its allocation account that does not meet the above requirements shall be presumed to be a loan or contribution from the non-federal account to a federal account, in violation of the Act. 11 CFR 106.5(g)(1)(ii) and 106.6 (e)(1)(ii)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



J. P. Moore
Reports Analyst
Reports Analysis Division

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